

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

In re:	§	
	§	
McClain Feed Yard, Inc., et al,	§	Case No. 23-20084-rlj-7
	§	
<i>Debtors.</i>	§	Jointly Administered

**AGREED MOTION FOR THE WITHDRAWAL OF C. DUNHAM BILES AND
STEPTOE & JOHNSON PLLC AS COUNSEL FOR FIRST BANK & TRUST**

Interested Party HTLF Bank (“HTLF”) as successor to First Bank & Trust (“First Bank”) files this Agreed Motion for the Withdrawal of C. Dunham Biles and Steptoe & Johnson PLLC as Counsel for First Bank (“Motion”).

**I.
Relief Requested**

First Bank currently represented by C. Dunham Biles, formerly of Steptoe & Johnson PLLC, 500 N. Akard St., Suite 3200, Dallas, Texas 75201 and John H. Lovell, Lovell, Lovell, Isern, Farabough LLP, 112 SW 8th Street, Amarillo, Texas 79101. Accordingly, First Bank requests that the Court enter an order Mr. Biles and the firm of Steptoe & Johnson PLLC to withdraw as attorneys of record for First Bank. First Bank will continue to be represented by John H. Lovell.

First Bank consents to the withdrawal of Mr. Biles and Steptoe & Johnson PLLC in this matter. Debtor agrees to the relief requested.

**II.
Conclusion and Prayer**

First Bank requests that the Court grant the Motion, allow Mr. Biles and Steptoe & Johnson PLLC to withdraw as counsel of record for First Bank, and grant First Bank any further relief to which may be entitled.

**LOVELL, LOVELL, ISERN &
FARABOUGH, LLP**

/s/ John H. Lovell

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And

BILES WILSON, PLLC

/s/ C. Dunham Biles

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**ATTORNEYS FOR PLAINTIFF
HTLF BANK**

AGREED TO:

/s/ Meg Killian

Meg Killian
HTLF Bank

CERTIFICATION OF CONFERENCE

I certify that I conferred with Plaintiff's counsel prior to filing and Plaintiff is not opposed to the relief sought by this Motion.

/s/ John H. Lovell

John H. Lovell

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing instrument was served, *via* e-service, upon all attorneys of record in this matter on December 12, 2024.

/s/ C. Dunham Biles

C. Dunham Biles